

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO, as representative of

THE COMMONWEALTH OF
PUERTO RICO, *et al.*

Debtors,¹

PROMESA
Title III

No. 17-BK-3283 (LTS)

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO, as a representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA
Title III

No. 17-BK-03567 (LTS)

**NOTICE OF THE AD HOC GROUP OF FGIC
INSURED NOTEHOLDERS OF INTENT TO
PARTICIPATE IN DISCOVERY
FOR CONFIRMATION OF COMMONWEALTH PLAN OF ADJUSTMENT**

Taconic Capital Advisors LP, Aurelius Capital Management, LP, Canyon Capital Advisors LLC, First Ballantyne LLC, and Moore Capital Management, LP (collectively, the “Ad Hoc Group of FGIC Insured Noteholders”)² hereby submits its notice of intent to participate in discovery for

¹The Debtors in the various Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Each member of the Ad Hoc Group of FGIC Insured Noteholders files this notice exclusively on its own behalf and does not assume any fiduciary or other duties to any other member or to any other entity or individual.

confirmation of the *Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [Dkt. No. 17627], as amended, modified, or supplemented (the “Plan”), pursuant to the Court’s *Order Establishing Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* [Dkt. No. 17640], and respectfully states as follows:

1. The Ad Hoc Group of FGIC Insured Noteholders advises the Debtors that it intends to participate in discovery in connection with confirmation of the Plan.
2. The contact information of the Ad Hoc Group of FGIC Insured Noteholders is as follows:

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and

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3. Information concerning claims of the members of the Ad Hoc Group of FGIC Insured Noteholders, as set forth in certain proofs of claim filed in these Title III Cases, is set forth in Exhibit A hereto.

WHEREFORE, the Ad Hoc Group of FGIC Insured Noteholders respectfully requests that the Court take notice of the foregoing.

Dated: August 13, 2021

Respectfully submitted,

CÓRDOVA & DICK, LLC

/s/Brian M. Dick Biascoechea

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*Local Counsel to the Ad Hoc Group of FGIC Insured
Noteholders*

- and -

SHEPPARD MULLIN RICHTER & HAMPTON LLP

/s/Lawrence A. Larose

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*Counsel to the Ad Hoc Group of FGIC Insured
Noteholders*

EXHIBIT A

Claimant	Proof of Claim Number	Debtor
Aurelius Capital Master, Ltd.	66514	Commonwealth
ACP Master, Ltd.	65801	Commonwealth
Canyon-ASP Fund, L.P.	125494	Commonwealth
	174385	PBA
Canyon Balanced Master Fund, Ltd.	125727	Commonwealth
	174380	PBA
Canyon Blue Credit Investment Fund L.P.	129774	Commonwealth
	174384	PBA
Canyon Distressed Opportunity Investing Fund II, L.P.	115697	Commonwealth
	174371	PBA
Canyon Distressed Opportunity Master Fund II, L.P.	115491	Commonwealth
	174369	PBA
Canyon-GRF Master Fund II, L.P.	119870	Commonwealth
	174388	PBA
Canyon NZ-DOF Investing, L.P.	116228	Commonwealth
	174373	PBA
Canyon-SL Value Fund, L.P.	143207	Commonwealth
Canyon Value Realization Fund, L.P.	122624	Commonwealth
	174378	PBA
Canyon Value Realization MAC 18, Ltd.	122563	Commonwealth
	174392	PBA
EP Canyon Ltd.	125330	Commonwealth
	174398	PBA
The Canyon Value Realization Master Fund, L.P.	159397	Commonwealth
	174397	PBA
Canyon GCM PR SPV, LLC	174393	PBA
Canyon Distressed TX (A) LLC	174363	PBA
Canyon-EDOF (Master) L.P.	174645	PBA
First Ballantyne and Affiliates	20356	Commonwealth
The Bank of New York Mellon, as Fiscal Agent	38574	HTA
The Bank of New York Mellon, as Fiscal Agent	32622	HTA
Taconic Master Fund 1.5 LP	79913	Commonwealth
	89144	Commonwealth
Taconic Opportunity Master Fund LP	130112	Commonwealth
	91722	Commonwealth

